

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MEI KUM CHU, SAU KING CHUNG, and QUN XIANG
LING, individually and on behalf of all others similarly
situated,

Plaintiffs,

- against -

CHINESE-AMERICAN PLANNING COUNCIL HOME
ATTENDANT PROGRAM, INC.,

Defendant.

Civil Action No.: 1:21-cv-02115-
AT

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the annexed declaration of Kenneth Kirschner, with exhibits, executed on March 18, 2021, and the accompanying memorandum of law, Defendant Chinese-American Planning Council Home Attendant Program, Inc. (“CPC”), by its undersigned counsel, will move this Court at a date and time to be set by the Court for an order:

1. Dismissing the instant action before this Court pursuant to the “prior suit pending” doctrine; or, in the alternative,
2. Staying the instant action before this Court in part, pursuant to 9 U.S.C. § 3, until the final resolution of the arbitration; and
3. Granting such further relief as the Court finds proper and just.

Good cause for granting the motion exists for the reasons set forth in the accompanying memorandum of law.

Dated: New York, New York
March 18, 2021

Respectfully Submitted,

HOGAN LOVELLS US LLP

By: /s/ Kenneth Kirschner

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